

Pro Se 1 2016

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Gayle D. Hanks  
Cheri Makay Wright  
Oropez

Plaintiff(s),

v.

City of Seattle  
"OHANA" &  
Dennis b. Hoffman  
16234-9th NE

Defendant(s).

CASE NO. 2:21-cv-00601 JCC  
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial: ☒ Yes ☐ No

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Gayle D Hanks / Cheri M. Oropez
Street Address	1236 NE 184th PL / 75 NORTH Drive
City and County	Shoreline / King Westbury / Nassau
State and Zip Code	Wa 98158 NEW YORK 11590
Telephone Number	206 363-9050 1-516-456-1052

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## 1 B. Defendant(s)

2 Provide the information below for each defendant named in the complaint, whether the  
 3 defendant is an individual, a government agency, an organization, or a corporation. For an  
 4 individual defendant, include the person's job or title (if known). Attach additional pages if  
 5 needed.

## 6 Defendant No. 1

7 Name

8 Job or Title (if known)

9 Street Address

10 City and County

11 State and Zip Code

12 Telephone Number

OHANA  
 GUARDIAN Ste #209  
~~10050 NE 3rd~~ 155 NE 100th  
 Seattle King  
 Wash. 98125

## 13 Defendant No. 2

14 Name

15 Job or Title (if known)

16 Street Address

17 City and County

18 State and Zip Code

19 Telephone Number

dennis b Hoffman  
 lawn mower / thief  
 16234 - 9th NE  
 Shoreline King  
 Wa 98155  
 206-362-3720

## 20 Defendant No. 3

21 Name

22 Job or Title (if known)

23 Street Address

24 City and County

State and Zip Code

Telephone Number

7 attorneys involved  
 all lied to get  
 my aunts money  
 Karl ✓

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Defendant No. 4

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

**II. BASIS FOR JURISDICTION**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)☐ Federal question☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

*These people lied but before  
them dennis b. Hoffman assaulted  
me May 23rd 2017 & 09/17/2018  
& assaulted Cheri on Aug 27th 2018*

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B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual.

The plaintiff (name) Cheri Oropez Hanks <sup>Gayle</sup> is a citizen of the  
State of (name) New York <sup>Wa</sup>.

b. If the plaintiff is a corporation.

The plaintiff, (name) \_\_\_\_\_, is incorporated under  
the laws of the State of (name) \_\_\_\_\_, is incorporated under  
the laws of the State of (name) \_\_\_\_\_, and has its principal  
place of business in the State of (name) \_\_\_\_\_.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual.

The defendant, (name) dennis b Hoffman, is a citizen of the  
State of (name) Wa. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation.

The defendant, (name) O'Hana (Mark C. Vohr) is incorporated under  
the laws of the State of (name) Wa, and has its principal  
place of business in the State of (name) Wa.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) Wa O'Hana.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

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## 3. The Amount in Controversy.

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (explain):

over 1 million in cash \$  
that they are keeping my aunt/her  
mom from her friends & family  
for her \$\$\$

## III. STATEMENT OF CLAIM

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Oban lied Dennis lied & assaulted us  
then they filed baseless/fact-less claims  
against us to get Eunice O. Wright  
\$\$\$\$

## IV. RELIEF

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

we want them out/in Jail  
& us to be able to see my aunt  
& her mom. This is on my record  
& is a lie

## V. CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper

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purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;  
 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or  
 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so  
 identified, will likely have evidentiary support after a reasonable opportunity for further  
 investigation or discovery; and (4) the complaint otherwise complies with the requirements of  
 Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related  
 papers may be served. I understand that my failure to keep a current address on file with the  
 Clerk's Office may result in the dismissal of my case.

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff

May 4, 2021  
 Gayle D Hanks Cheri M. Oropez  
 Gayle D Hanks Cheri M. Oropez

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff

May 4, 2021  
 Cheri M. Oropez  
 Cheri M. Oropez

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff

CLERK, UNITED STATES DISTRICT COURT  
UNITED STATES COURTHOUSE  
700 STEWART STREET, SUITE 2310  
SEATTLE, WA 98101  
OFFICIAL BUSINESS  
PENALTY FOR PRIVATE USE \$300

**U.S. District Court**

Complete transaction sheet & stamp the  
**FIRST** page of each document

Gayle D. Hanks  
206-363-9050